

# OSBORN LAW P.C.

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## MEMORANDUM ENDORSED

April 23, 2025

### VIA ECF

Honorable Gabriel W. Gorenstein  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *Johnson v. Commissioner of Social Security*  
Civil Action No. 1:25-cv-00878-GWG

Dear Judge Gorenstein,

We write on behalf of our client, Beatriz Delvalle Johnson, with the consent of the defense, to request additional time to file her motion for judgment on the pleadings which is currently due on May 2, 2025, per the Court's April 3, 2025 Scheduling Order. This is the parties' first request for an extension. Plaintiff's counsel needs additional time due to a heavy caseload in the next several weeks, an upcoming trial, and an upcoming Demurrer hearing.

After conferring with the defendant, the parties have agreed to proceed according to the following amended scheduling order, subject to the Court's approval:

- Plaintiff to file her motion for judgment on the pleadings on or before: **July 11, 2025**;
- Defendant to file its response to plaintiff's motion/cross motion on or before: **September 19, 2025**; and
- Plaintiff to file her reply, if any, on or before: **October 3, 2025**.

Honorable Gabriel W. Gorenstein  
April 23, 2025  
Page Two

Thank you for your consideration of this request.

Respectfully submitted,

s/Daniel A. Osborn

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cc: Karen G. Fiszer, Esq. (by ECF)

The proposed schedule is approved. Given the length of the briefing schedule, the parties should not expect any further extensions.

So Ordered.

  
GABRIEL W. GORENSTEIN  
United States Magistrate Judge  
April 24, 2025